



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, NY 10007*

June 12, 2020

By ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: United States v. Mustapha Raji,
19 Cr. 870 (JMF)**

Dear Judge Furman:

The Government respectfully submits this letter, as directed by the Court, in response to defendant Mustapha Raji's letter requesting that the defendant's conditions of release be modified. (ECF Nos. 27, 28). Because the Government has, as of the filing of this letter, not received any financial or background information relevant to its evaluation of the suitability of the two proposed co-signers, and consequently has not interviewed them, the Government respectfully requests that it be allowed the opportunity to evaluate the two proposed co-signers and confer with defense counsel prior to taking a position on this request.

The Government initially asked for financial and related documentation regarding the proposed co-signers before the motion for release was filed, in an attempt to negotiate agreed-upon conditions of bail in the first instance without the Court's intervention. Defense counsel did not so provide, and then indicated its intent to file a motion instead. As of the filing of this letter, defense counsel still has yet to provide any relevant information that would be necessary for the Government to interview and evaluate the proposed co-signers, beyond that set forth in its filing with the Court. Moreover, defense counsel did not confer with the Government prior to filing its application, to see if the parties could resolve this dispute without the Court's intervention.

Since the defendant cannot be released without this Office's approval of at least two co-signers, even under the proposed terms of the defendant's instant request, the Government respectfully requests that the Court order the defendant to provide the relevant information regarding the co-signers, and allow the Government to review said information and interview them prior to providing its position on further modification of the conditions of release—a process that would be necessary in any event prior to the defendant's release. (*See* ECF No. 25

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